

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**NORTHWEST AIRLINES CORPORATION, et al.,  
Debtors.**

**BRUCE W. CRESS, PETER OCHABAUER, WALTER  
BOULDEN, MARK A. KNUDSEN, CHRISTOPHER J.  
PARKYN, AMANDA R. OCHABAUER, AND BERNARD  
C. LARKIN,**

**Appellants,**

**-against-**

**NORTHWEST AIRLINES CORPORATION, et al.,  
Appellees.**

**Chapter 11**

**Case No. 05-17930 (ALG)**

**Jointly Administered**

**Case No. 07-cv-05658 (JGK)**

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated March 21, 2008, the Declaration of Nathan A. Haynes, dated March 21, 2008, and all pleadings and proceedings herein, Appellee hereby respectfully moves for entry of an order pursuant to rule 8009 of the Federal Rules of Bankruptcy Procedure, at a date and time to be determined by this Court, to dismiss the appeal for failure to timely file Appellants' brief.

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Dated: New York, New York  
March 21, 2008

CADWALADER, WICKERSHAM & TAFT LLP

/s/ Nathan A. Haynes

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\* *Pro hac vice* admission pending